

**COMMUNICATION STRATEGY - Deliberative Process – Internal EPA Use
Columbia Falls Aluminum Reduction Plant**

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Site Information:

Superfund Site Name: Anaconda Aluminum Co Col Fls Red Plt
(Col Fls Red Plt = Columbia Falls Reduction Plant – Named in 1980s)
a/k/a Columbia Falls Reduction Plant and Columbia Falls Aluminum Company Plant
2000 Aluminum Drive, Columbia Falls, MT, 59912

Action: Finalization of an administrative order on consent (AOC) with Columbia Falls Aluminum Company requiring remedial investigation and feasibility study (RI/FS).

Communication Goals:

- To communicate information about the finalization of the EPA-CFAC settlement agreement.
- To communicate information about the timing for and elements of the RI/FS process.
- To communicate EPA's role in overseeing the RI/FS being conducted by CFAC.

Key Messages:

- The CERCLA settlement includes a legally binding administrative settlement agreement as well as a detailed work plan to carry out the RI/FS.
- Under the agreement, the Site's current owner, Columbia Falls Aluminum Company, will conduct a comprehensive investigation of soils, river sediments, and ground and surface water to determine the nature and extent of contamination at the site. The company also will reimburse EPA for its future costs in overseeing the investigation.
- Under the terms of the agreement, CFAC's parent company, Glencore Ltd., will provide EPA with a \$4 million irrevocable letter of credit to cover EPA's cost of completing the RI/FS in the event that CFAC is unable or unwilling to complete the work.
- EPA kept the Montana DEQ apprised of the status of settlement negotiations and involved the DEQ in the development and review of the detailed RI/FS work plan.
- After the RI/FS is completed and once EPA selects a cleanup remedy in a record of decision, EPA will negotiate a judicial consent decree for remedial design and remedial action (RD/RA) with one or both PRPs.
- At that time, EPA will negotiate additional financial assurance to cover remedy implementation as part of RD/RA negotiations.

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Activity Timeline:

Date	Activity	Person(s) Responsible	Notes/Follow-up
TBD (AOC signed by EPA)	Notify federal elected officials	Rebecca Russo, Cynthia Peterson	
TBD (AOC signed by EPA)	In coordination with MDEQ, notify governor's office and other state officials	Mike Cirian, Cynthia Peterson	
TBD (AOC signed by EPA)	Notify local officials (County, City, Health Board)	Mike Cirian, Cynthia Peterson	
TBD (AOC signed by EPA)	Send announcement to mailing list	Cynthia Peterson	
TBD (AOC signed by EPA)	Issue press release to local media	Cynthia Peterson, Rich Mylott	
TBD	Attend 1/14/2016 Community Liaison Panel if invited to discuss AOC and future activities	Mike Cirian	
TBD	Prepare follow up information about future activities, as needed, including RI/FS work plan and NPL listing process	Site team	
January 2016	Conduct community interviews and prepare Community Involvement Plan	Cynthia Peterson and Site Team	To be done prior to RI

Constraints:

- CFAC has requested that EPA utilize the Superfund Alternative approach in lieu of listing the Site on the National Priorities List (NPL). EPA management is considering the company's request.
- Some members of the community oppose listing the Site on the NPL and support the Superfund Alternative Approach.
- The NPL listing is pending with HQ and likely will not be finalized until fall 2016.

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Background:

On March 26, 2015, EPA proposed the Anaconda Aluminum Co Columbia Falls Reduction Plant Superfund Site near Columbia Falls, Montana for NPL listing with Governor Bullock's support.

On June 10, 2015, EPA sent CERCLA general notice and demand letters to the potentially responsible parties (PRPs).

The PRPs are 1) Columbia Falls Aluminum Company (CFAC) (current owner and/or operator) and 2) Atlantic Richfield Company (past owner and/or operator).

Key Contacts:

EPA Region 8:

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Joe Vranka
Montana Superfund Unit Supervisor
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Congressional and Intergovernmental Liaison
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MDEQ:

Tom Livers, Director 406-444-2544
Jenny Chambers, Remediation Division Administrator, 406-841-5001
Tom Stoops, Federal Superfund Bureau Chief, 406-444-6445
Mike Trombetta, Hazardous Waste Site Cleanup Bureau Chief, 406-841-5045
Denise Martin, Site Response Section Supervisor, 406-841-5060
Jeni Garcin-Flatow, Public Information Officer, 406-841-5016

Elected Officials:

Federal

Senator Jon Tester
Kalispell, MT Office
8 Third Avenue East
Kalispell, MT 59901
406-257-3360

Senator Steve Daines
218 East Front Street, Ste. 103
Missoula, MT 59802
406-549-8198

Representative Ryan Zinke,
710 Central Avenue
Great Falls, MT 59401
406-952-1210

State

Governor Steve Bullock
Office of the Governor
P.O. Box 200801
Helena, MT 59620-0801
406-444-3111

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County

Board of County Commissioners
800 S. Main Street
Kalispell, MT 59901
(406) 758-5503

Flathead City-County Health Department
1035 1st Avenue West
Kalispell, MT 59901
406-751-8101

Columbia Falls

City of Columbia Falls
City Hall
130 6th Street West
Columbia Falls, Montana 59912
406-892-4391
<http://cityofcolumbiafalls.org/>

Mayor Donald W. Barnhart
Town Council

Community Groups:

Columbia Falls Area Chamber of Commerce
PO Box 312
Columbia Falls, Montana 59912
Phone: 406-892-2072
<http://www.columbiafallschamber.org/>

Flathead Basin Commission
Flathead Lakers

Local Media:

Hungry Horse News
Richard Hanners, editor
926 Nucleus Ave
Columbia Falls, MT 59912
406-892-2151
<http://www.flatheadnewsgroup.com/hungryhorsenews/>

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Flathead Beacon
Kelllyn Brown editor
217 Main Street
Kalispell, MT 59901
406025709220
http://www.flatheadbeacon.com/about_us/

AM Radio

- KERR 750, Anderson Radio Broadcasting, Inc.
- KJJR 880, Bee Broadcasting, Inc.
- KOFI 1180, KOFI, Inc.
- KSAM 1240, Bee Broadcasting, Inc.
- KQJZ 1340, Anderson Radio Broadcasting, Inc.

FM Radio

- KUKL-FM 90.1, University of Montana-Missoula
- KQRK 92.3, Anderson Radio Broadcasting, Inc.
- KHNK 95.9, Bee Broadcasting, Inc.
- KALS 97.1, Kalispell Christian Radio Fellowship
- KBBZ 98.5, Bee Broadcasting, Inc.
- KKMT 99.7, Anderson Radio Broadcasting, Inc.
- KIBG 100.7, Anderson Radio Broadcasting, Inc.
- KXZI-LP 101.9, Scott Johnston
- KANB-LP 102.3, Flathead Adventist Radio
- KRVO 103.1, Bee Broadcasting, Inc.
- KQJZ 103.5, Anderson Radio Broadcasting, Inc.
- KZMN 103.9, KOFI, Inc.
- KWOL-FM 105.1, Bee Broadcasting, Inc.
- KDBR 106.3, Bee Broadcasting, Inc.

Television

- KCFW (NBC), Channel 9
- KAJJ-CD (CBS), Channel 39

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- K26DD (TBN), Channel 26
- K29AA-D (PBS), Channel 29
- KEXI-LD (PBS), Channel 35
- KCFW-DT (NBC), Channel 38
- KTMF-LD (ABC), Channel 42

Activities – Communication Planning

FAQs:

When will CFAC begin work on the RI/FS?

CFAC will begin the RI in the spring of 2016, which will a comprehensive investigation of soils, river sediments, and ground and surface water to determine the nature and extent of contamination at the site.

When will the RI/FS be finished and the cleanup be started?

CFAC will start the RI in the spring of 2016, and it is anticipated that CFAC will complete the feasibility study in approximately _____, in accordance with the approved RI/FS workplan that is part of the settlement agreement. This timeline is subject to change as the RI/FS progresses.

Does this mean the site won't be listed on the NPL and become a Superfund site?

No. EPA has proposed for listing on the NPL, which would make the Site eligible for federal cleanup funding. A final decision on NPL listing is expected no sooner than fall 2016. Until then, CFAC will be conducting the RI/FS under the AOC.

Will EPA agree to utilize the Superfund Alternative approach in lieu of finalizing the NPL listing?

CFAC has asked EPA to consider using the SA approach for this site. EPA management is considering CFAC's request. In the meantime, CFAC has agreed to proceed with the RI/FS to determine the nature and extent of contamination.

What will happen if CFAC doesn't complete the work required in the AOC?

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Under the settlement agreement, CFAC has provided a robust \$4 million in liquid financial assurance to ensure that EPA has the resources to complete the RI/FS, if CFAC becomes unable or unwilling to complete the work.

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How will EPA ensure that the work is completed?

EPA, in consultation with Montana DEQ, will oversee the RI/FS being conducted by CFAC. EPA, with input from the State, negotiated a detailed RI/FS workplan with CFAC, which is part of the settlement agreement. The availability of the detailed workplan at this stage will expedite the RI/FS process.

What will the state's role be during the RI/FS?

The State will have substantial and meaningful involvement in the RI/FS. The Montana DEQ has already had input into the development of the detailed RI/FS workplan. As CFAC conducts the RI/FS, the State will receive copies of CFAC work products (deliverables), progress reports, and notification of releases, as well as having site access and the ability to take split samples.

When will the public have an opportunity to participate in decision making at the Site?

The public will have an opportunity to comment on the proposed cleanup plan that is developed by EPA at the conclusion of the RI/FS process. EPA will create a Community Involvement Plan that ensures information is shared with the public as appropriate during the RI/FS.

What did CFAC get from EPA in the settlement?

CFAC received a covenant not to sue from EPA for the “matters addressed” in the settlement agreement, namely, the RI/FS. This covenant not to sue does not cover the cleanup, which will be the subject of another legal agreement at a later date once the RI/FS has been completed and EPA selects a cleanup remedy.

Why isn't Atlantic Richfield participating in the RI/FS?

EPA notified both CFAC and Atlantic Richfield Company of their potential liability under the federal Superfund law. CFAC, as the current owner/operator, agreed to enter into negotiations with EPA to perform the RI/FS. EPA cannot comment on its enforcement strategy with respect to Atlantic Richfield Company. However, Atlantic Richfield Company will have an opportunity to help implement or pay for the cleanup remedy selected by EPA.